

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Paul's Tank Cleaning - RV2 - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #5
FINAL
Paul's Tank Cleaning - RV2
02CU
Hainesport, NJ
Latitude: 39.9776000 Longitude: -74.8149000

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From: Mark Gallo, On-Scene Coordinator

Date: 5/27/2014

Reporting Period: May 12-20, 2014

1. Introduction

1.1 Background

Site Number:	02CU	Contract Number:	EP-S2-10-03
D.O. Number:	80	Action Memo Date:	3/26/2014
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/18/2013	Start Date:	11/18/2013
Demob Date:	5/20/2014	Completion Date:	5/20/2014
CERCLIS ID:	NJD980772560	RCRIS ID:	NJD980772560
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Removal Action (RV2) at the former Paul's Tank Cleaning facility (the Site)

1.1.2 Site Description

Paul's Tank Cleaning Service operated at the Site from 1962 to 1982. During this period, the company cleaned out residual waste from tanks at schools, factories, and ships on the Philadelphia waterfront. The Site, a relatively flat, vacant parcel containing sandy soils with limited vegetation, was formerly used in conjunction with the tank cleaning operations.

In July of 2008, the EPA Removal Action Branch (RAB) received a verbal request from the New Jersey Department of Environmental Protection (NJDEP) to evaluate the Site for a CERCLA removal action. The NJDEP's verbal request was formalized with a written request dated November 3, 2008.

Pursuant to the NJDEP's verbal request, the RAB's Removal Assessment and Enforcement Section conducted a removal assessment which included Site visits in August and October of 2008. During this assessment, there was evidence that the Site was being utilized for recreational activities such as paintball and the riding of all-terrain vehicles (ATVs). Furthermore, there were a total of fifteen tanks and/or tank trucks present at the Site, and many of the hatches were open and easily accessible. At least eight of the tanks had released waste oil and sludge contained within them.

Based on the results and data collected during the removal site evaluation, an Action Memorandum was approved on 9/30/2009. Under the 9/30/2009 Action Memorandum, EPA-RAB initiated the first removal action (RV1) at the Site on 4/5/2010. The initial action addressed releases of hazardous substances from tanks and above ground storage vessels, as well as releases impacting surface soils. During the initial removal action, EPA-RAB conducted additional Site assessment work in order to identify potential subsurface contamination. During the 2010 assessment work, EPA identified two areas of concern (AOCs) with respect to subsurface soil contamination. One area identified elevated levels of polychlorinated biphenyls (PCBs) and the second area identified elevated levels of polyaromatic hydrocarbons (PAHs).

Based on the results and data of the subsurface soil investigation, EPA RAB developed a second Action Memorandum (RV2) that was approved on 9/24/2013. The Action Memorandum approved on 9/24/2013 provided authorization for a removal action to address the contamination of subsurface soil at the two AOCs identified at the Site.

1.1.2.1 Location

The Site consists of an industrial zoned, three-acre parcel of land (Block 96, Lot 1.07) located at 1225 Industrial Boulevard in Hainesport Township, Burlington County, New Jersey 08036. Industrial Boulevard, which runs between Hainesport-Lumberton Road and Route 38, is no longer accessible as a public road. It has been closed off with concrete barriers at Lumberton Rd and secured at Rt 38 by a flagged wire cable. The Rt 38 area of Industrial Blvd has been dissolved by Hainesport Twp and is currently under private ownership.

1.1.2.2 Description of Threat

Two AOCs were identified at the Site. Both AOCs were found to have elevated levels of hazardous substances in the surface and subsurface soil. The first AOC contained elevated levels of PCBs at and around a containment area for a former 20,000 gallon storage tank. The second AOC contained elevated levels of PAHs at a low lying area believed to be the location of a former lagoon for the Paul's Tank Cleaning operations. The potential for off-site migration of these hazardous substances presented a threat to the public and/or the environment.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

A removal site evaluation (RSE) was completed in June 2009. The RSE found the Site eligible for a removal action due to the presence of hazardous substances in tanks and surface soils at the Site. Additional site assessment activities continued in 2010 during the initial EPA removal action addressing the hazardous substance in tanks and surface soil. The 2010 site assessment included additional sampling of site soils and further identified two primary AOCs. During the 2010 assessment, elevated levels of PCBs and PAHs were identified to depths of approximately 36 inches below the ground surface. A second Action Memorandum was approved on 9/24/2013 to address the two AOCs. The information contained in this Pollution Report is associated with the removal action authorized under the 9/24/2013 Action Memorandum.

2. Current Activities

2.1 Operations Section

May 12-20, 2014

On 5/15/2014 EPA, with the support of RST, conducted additional subsurface soil sampling off-site. Sampling was conducted along the southeastern boundary of the Paul's Tank Site, the area adjacent to the former on-site lagoon. Twelve samples at 6 inch increments were collected from six separate locations. The sample depths ranged from 9-16 feet below grade, at the soil/ground water interface. Sample depths were biased toward soils having signs of possible contamination. The purpose of the sampling was to document if contamination has migrated from the Site via ground water. Samples were shipped to a NELAP accredited commercial laboratory for VOC and SVOC analysis. Preliminary results are expected during the week of June 2, 2014.

Six off-site and four on-site soil gas samples were also collected on 5/15/2014. Samples were collected within the 1 ft zone above the ground water level. The off-site samples were collected along the southeastern perimeter of the Site and the on-site samples were collected along the perimeter of the former lagoon area. Samples were collected to document soil gas levels that may be a result of ground water contamination which was observed during the recent removal action. Soil gas samples were shipped to an EPA CLP laboratory for VOC analysis. Preliminary results are expected during the week of June 2, 2014.

On 5/20/2014 the EPA Environmental Response Team (ERT), with the support of the SERAS contractor, was on-site to conduct the assessment and recovery of any gases from two cylinders excavated during the recent removal action. ERT confirmed the cylinders as being oxygen and acetylene. The caps of both cylinders were required to be cut but both cylinder valves were found to be in functional condition. The oxygen cylinder was found to be empty and the acetylene cylinder was found to have very low pressure and was safely vented. Valves were removed from both cylinders and the Township of Hainesport has indicated that they will be able to conduct the final scrapping / disposal of the empty cylinders.

As of 5/20/2014, all EPA personnel, contractors, and equipment have been demobilized from the Site. The completion of the cylinder assessment, venting, and removal of valves completes the removal action at the Site. This report will be the final Pollution Report for this removal action. Results and findings related to the off-site soil sampling as well as the soil gas survey conducted on and off the Site will be documented in the final Removal Action Report (RAR) which will be compiled and finalized following the receipt of all disposal documentation. Once finalized, the RAR will be available on the Paul's Tank Cleaning Site website, <http://www.epaosoc.org/PTCRV2>.

The table below represents all waste shipped off-site as of the date of this report.

Waste Stream	Date	Quantity	Manifest #	Facility	Disposal
Non-Hazardous PAH Contaminated Soil	3/13/14 thru 3/21/14	3350 tons	Non-Hazardous Manifests (129 Truck Loads)	CCIA	Landfill Daily Cover
Non-Hazardous PAH Contaminated Soil	3/26/14 thru 4/2/14	2687 tons	Non-Hazardous Manifests (102 Truck Loads)	BSM	Thermal Treatment for re-use
Non-TSCA PCB Contaminated Soil	4/3/14	245 tons	Non-Hazardous Manifests(9 Truck Loads)	CCIA	Landfill Daily Cover

Non-TSCA PCB Contaminated Soil	5/2/14	446 tons*	Non-Hazardous Manifests (17 Truck Loads)	CCIA	Landfill Daily Cover
Non-TSCA PCB Contaminated Soil	5/7/2014	250 tons*	Non-Hazardous Manifests (12 Truck Loads)	CCIA	Landfill Daily Cover
Non-Hazardous Wastewater	4/29-30/14	18,500* gal	Non-Hazardous Manifests(4 Truck Loads)	ERC	Treatment
TSCA Regulated PCB Contaminated Soil	5/5/2014	478* tons	Hazardous Waste Manifests(20 Truck Loads)	HES	RCRA Landfill
Solid Waste and Debris	5/8/2014	10* tons	Non-Hazardous Waste Manifest(1 Truck Load)	CycleChem	Landfill

Note: (*) denotes approximate weights, final weight tickets have not yet been received.

CCIA – Cumberland County Improvement Authority, 169 Jesses Bridge Rd, Millville, NJ

BSM – Bayshore Soil Management, 75 Crows Mill Rd, Keasbey, NJ

ERC – Environmental Recovery Corporation, 1076 Old Manheim Pike, Lancaster, PA

HES – Heritage Environmental Services, 4370 W. County Road 1275 N, Roachdale, IN

CycleChem – Solid waste load being processed through CycleChem Facility in Lewisberry, PA with final disposal planned for Republic Services, Modern Landfill & Recycling, 4400 Mount Pisgah Rd, York, PA

2.2 Planning Section

NA - Removal action completed on 5/20/2014

2.3 Logistics Section

NA - Removal action completed on 5/20/2014

2.4 Finance Section

2.4.1 Narrative

The Action Memorandum authorizing this removal action was approved on 9/24/2013. An initial ERRS Task Order was issued for \$500,000 on 9/27/2013.

On 2/21/2014, a request was submitted to increase the ERRS Task Order to \$850,000. This amount includes \$720,000 of mitigation funding approved under the 9/24/2013 Action Memorandum plus \$130,000 of contingency funding approved in the Action Memorandum.

On 3/14/2014, an ERRS Task Order Modification was issued to increase the ERRS Ceiling from \$500,000 to \$850,000.

On 3/26/2014, an Action Memorandum requesting a ceiling increase and \$2M exemption was approved. The increase request was to cover additional costs associated with contamination identified during the November 2013 assessment work. The overall project ceiling was increased to \$2,146,800 with a ceiling of \$1,794,000 for remediation contracting.

On 5/1/2014, an amount of \$14,000 was requested and obligated to the EPA Environmental Response Team (ERT) for their support with the assessment and recovery of 2 on-site cylinders.

As of 5/20/2014 the removal was completed. EPA will continue to work with all contractors to finalize all Site costs as invoices are received and reviewed.

The following table represents the overall project costs. Costs are listed by specific actions taken or being taken at the Site and the total ceiling level for the Site. The approved cost for the RV1 removal action are associated with the 2010 removal action that dealt with the removal of hazardous substances from on-site storage containers as well as the removal of grossly contaminated surface soil. The approved costs for the RV2 removal action are associated with the on-going action to address the removal of contamination from subsurface soil.

	Approved Ceiling (RV1)	Approved Ceiling (RV2)	Approved Ceiling Increase, \$2M Exemption (RV2)	Total Project Ceiling	Obligated Funds to Date	Ceiling Balance	% Ceiling Remaining
Total Cleanup Contractor Cost	\$755,000	\$720,000	\$319,000	\$1,794,000	\$1,605,000	\$189,000	10.5%
Removal Support Team, Extramural Costs	\$55,000	\$50,000	\$25,000	\$130,000	\$105,000	\$25,000	19.2%
Extramural Cost Contingency	\$0	\$154,000	\$68,800	\$222,800	\$14,000 *	\$208,800	93.7%
Totals	\$810,000	\$924,000	\$412,800	\$2,146,800	\$1,724,000	\$422,800	19.7%

(*) Represents costs obligated to ERT/SERAS

The following "Estimated Costs" table represents costs for the on-going removal action (RV2) to address contamination of subsurface soil.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$850,000.00	\$625,000.00	\$225,000.00	26.47%
TAT/START/RST	\$50,000.00	\$45,000.00	\$5,000.00	10.00%
ERT/SERAS	\$14,000.00	\$6,000.00	\$8,000.00	57.14%
Intramural Costs				
Total Site Costs	\$914,000.00	\$676,000.00	\$238,000.00	26.04%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

EPA has coordinated activities with Hainesport Township. The Site is currently under the ownership/management of the township and all Site responsibilities will be transitioned to the Township of Hainesport.

4. Personnel On Site

Personnel were on-site 5/15/2014 and 5/20/2014 to complete assessment and removal activities.

5/15/2014

OSC-1

RST-2

RST Drilling Subcontractor - 2

5/20/2014

OSC - 1

ERT - 1

SERAS - 3

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.